

FILED

OCT 10 2018

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
Plaintiff, )  
v. )  
MARKESE D. WATKINS, )  
Defendants. )

**4:18CR00845 JAR/PLC**

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges that:

On or about August 31, 2018, in the City of St. Louis, within the Eastern District of Missouri,

**MARKESE D. WATKINS,**

the Defendant herein, acting with others known and unknown, did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce or attempt to do so by robbery of Domino's Pizza, a commercial establishment engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 1951(a) and 2, and punishable under Title 18, Untied States Code, Section 1951(a).

**COUNT TWO**

The Grand Jury further charges that:

On or about August 31, 2018, in the City of St. Louis, within the Eastern District of Missouri,

**MARKESE D. WATKINS,**

the Defendant herein, acting with others known and unknown, knowingly possessed and brandished a firearm, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is, attempt to obstruct, delay, or affect commerce by robbery as charged in Count One herein.

In violation of Title 18, United States Code, Section 924(c)(1)(A) and 2, and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

A TRUE BILL

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FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

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Assistant United States Attorney